

Submitted to the Canadian Transportation Agency (Form submission)

Subject: Consultation on proposed changes to strengthen the Air Passenger Protection Regulations

Name: Christopher Mariano

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I am supportive of all the changes being proposed as part of the updating the APPR. Please see the uploaded document for further detail and rationale.

Attachment:

I am supportive of all the changes being proposed as part of the updating the APPR. Airlines are constantly identifying issues as "required for safety", or not providing detailed explanations or proof as to the cause of flight delays or cancellations, making it extremely difficult to customers to get any compensation. By removing the three categories of flight disruptions, having a defined list of "exceptional circumstances", and placing the responsibility on airlines to provide proof, this will hold airlines accountable to their schedule and tickets they sell.

Regarding the 48 hour rebooking proposal, I suggest this also be expanded to the airport or destination as well. For example, there may not be many flights a week to Waterloo from Miami (e.g. 2x a week), but there may be daily flights to Toronto. The proposed amendments seem to only apply to the airport of departure, but in many cases it would simplify things for the traveller if they could be rebooked to a nearby airport of destination. The traveller could also be reimbursed for travel from the nearby airport to their destination (e.g. the train from Toronto to Waterloo). This could place less financial burden on the airline if there are cheaper flight options and they would not need to reimburse hotels for as many nights. As well this could lead to less stress for the traveller as they may be able to go home earlier than if they had to wait for a flight to the original destination.

Regulations related to food and drink should be stronger. Quite often there is no staff around to provide vouchers or food, or the amount is minimal, e.g. a \$15 voucher for a three hour delay, which can not buy much food with the inflated prices at airports.

I support the restrictions on “knock-off effects”, as there is an expectation that airlines are able to compensate and recover from challenges that occur as part of normal inherent airline operations. However, it would be challenging for a customer to identify if the flight is part of this “two flights in a row exemption”, so strong language should be used to ensure the onus is on airlines to provide this level of detail.

Exceptional circumstances should not include labour disruptions for core airline staff, e.g. flight attendants, pilots, etc. Labour relations and employment related matters are in direct control of the airline, and are fully within the airlines control. However, labour disruptions outside of their control, e.g. airport staff, customer offers, etc, are outside of their control and would be acceptable to be included in the list of exceptional circumstances.